

Case 2:15-md-02641-DGC Document 1485 Filed 04/20/16 Page 7 of 9

3 | Nevada

4 6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

5 || Nevada

6 7. District Court and Division in which venue would be proper absent direct
7 filing:

8 United States District Court - Northern Nevada Division

9 8. Defendants (check Defendants against whom Complaint is made):

© C. R. Bard Inc.

© Bard Peripheral Vascular, Inc.

9. Basis of Jurisdiction:

13 ☒ Diversity of Citizenship

14 Other:

15 a. Other allegations of jurisdiction and venue not expressed in Master
16 Complaint:

17

18 || Page

19

10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making
a claim (Check applicable Inferior Vena Cava Filter(s)):

□ Recovery® Vena Cava Filter

□ G2® Vena Cava Filter

□ G2® Express Vena Cava Filter

25 | G2® X Vena Cava Filter

26 □ Eclipse® Vena Cava Filter

□ Meridian® Vena Cava Filter

1 Denali® Vena Cava Filter

2 Other: _____

3 11. Date of Implantation as to each product:

4 April 9, 2009

5

6 12. Counts in the Master Complaint brought by Plaintiff(s):

7 Count I: Strict Products Liability – Manufacturing Defect

8 Count II: Strict Products Liability – Information Defect (Failure

9 to Warn)

10 Count III: Strict Products Liability – Design Defect

11 Count IV: Negligence - Design

12 Count V: Negligence - Manufacture

13 Count VI: Negligence – Failure to Recall/Retrofit

14 Count VII: Negligence – Failure to Warn

15 Count VIII: Negligent Misrepresentation

16 Count IX: Negligence *Per Se*

17 Count X: Breach of Express Warranty

18 Count XI: Breach of Implied Warranty

19 Count XII: Fraudulent Misrepresentation

20 Count XIII: Fraudulent Concealment

21 Count XIV: Violations of Applicable Nevada _____ (insert

22 state) Law Prohibiting Consumer Fraud and Unfair and

23 Deceptive Trade Practices

24 Count XV: Loss of Consortium

25 Count XVI: Wrongful Death

26 Count XVII: Survival

27 Punitive Damages

Case 2:15-md-02641-DGC Document 1485 Filed 04/20/16 Page 9 of 9

3 _____

4 _____

5 _____

6 _____

7 _____

8 _____

13. Jury Trial demanded for all issues so triable?

10 | Yes

11 || □ No

12 || RESPECTFULLY SUBMITTED this 29th day of August, 2019.

[SIGNATURE BLOCK]

By: /s/ Bill Bradley

[Attorney name/address]

BRADLEY, DRENDEL & JEANNEYM, LTD.
6900 S. McCarran Boulevard, Suite 2000
Reno, Nevada 89509
Phone No. (775) 335-9999
Fax no. (775) 335-9993

19 I hereby certify that on this 29th day of August, 2019, I electronically
20 transmitted the attached document to the Clerk's Office using the CM/ECF System for
21 filing and transmittal of a Notice of Electronic Filing.

/s/ Erika Gentile